

**GIBSON, DUNN & CRUTCHER LLP**

John T. Cox III (Tex. Bar No. 24003722)  
Andrew LeGrand (Tex. Bar No. 24070132)  
2001 Ross Avenue, Suite 2100  
Dallas, Texas 75201-2911  
Tel.: 214.698.3100  
TCox@gibsondunn.com  
ALegrand@gibsondunn.com

Eric T. Haitz (Tex. Bar No. 24101851)  
811 Main Street, Suite 3000  
Houston, Texas 77002-6117  
Tel.: 346.718.6600  
EHaitz@gibsondunn.com

*Counsel to General Electric International, Inc.*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	Case No. 21-31488-sgj11V
WATTSTOCK, LLC,	§	
	§	Chapter 11
Debtor.	§	Subchapter V
	§	
WATTSTOCK, LLC, Plaintiff,	§	Adv. No. 21-3083
	§	
v.	§	<i>Removed from the District Court</i>
	§	<i>of Dallas County, Texas,</i>
ALTA POWER LLC, Defendant, Counter-Plaintiff,	§	<i>116th Judicial District</i>
and Third-Party Plaintiff,	§	
	§	<i>Cause No. DC-20-08331</i>
v.	§	
	§	
WATTSTOCK, LLC, Counter-Defendant, and	§	
	§	
GENERAL ELECTRIC INTERNATIONAL, INC.,	§	
d/b/a GE POWER SERVICES, Third-Party	§	
Defendant.	§	

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Pursuant to Federal Rule of Civil Procedure 16(b), made applicable to this proceeding by  
Federal Rule of Bankruptcy Procedure 7016, Third-Party Defendant General Electric

International, Inc. (“GE”) and Third-Party Plaintiff Alta Power LLC (“Alta) hereby respectfully move the Court to modify the Scheduling Order entered by the Court on February 24, 2022. Dkt. 32.

Under the current scheduling order, mediation must be held within forty-five (45) days following the Court’s May 31, 2022 order on GE’s 12(c) motion for judgment on the pleadings. *Id.*; Dkt. 47. Based on counsel’s recent, good-faith conferrals, mediation is unlikely to be productive at this time. GE and Alta thus seek to modify the scheduling order so that mediation may be conducted after the completion of fact and expert discovery, allowing the parties to approach negotiations with the benefit of more fulsome information. The Parties have conferred about the case schedule, and as a result of those discussions, GE and Alta jointly propose the following modifications to the scheduling order:

<b>Event</b>	<b>Deadline</b>
Deadline for Parties to Serve Initial Disclosures	August 11, 2022
Deadline for Completion of Fact Discovery	October 28, 2022
Deadline for Production of Expert Reports for the Party With Burden of Proof	October 31, 2022
Deadline for Production of Opposing Expert Reports	January 5, 2023
Deadline for Production of Rebuttal Expert Reports	January 31, 2023
Deadline for Completion of Expert Discovery	February 21, 2023
Deadline to Complete Mediation with Agreed-Upon Neutral Mediator	February 28, 2023
Deadline for Summary Judgment Motions	March 15, 2023
Deadline for Oppositions to Summary Judgment Motions	April 15, 2023
Deadline for Reply Briefs in Support of Summary Judgment Motions	May 1, 2023
Deadline for <i>Daubert</i> Motions	May 15, 2023
Deadline for Oppositions to <i>Daubert</i> Motions	June 10, 2023
Deadline for Reply Briefs in Support of <i>Daubert</i> Motions	June 24, 2023
Hearing regarding (i) outstanding motions, if any; and (ii) whether case is ready for trial at district court	August 30, 2023

Accordingly, GE and Alta jointly and respectfully request entry of a scheduling order consistent with these dates.

Dated: July 15, 2022

By: /s/ Joseph W. Golinkin II

**BAKER BOTTS L.L.P.**

Jessica B. Pulliam  
State Bar No. 24037309  
Jessica.pulliam@bakerbotts.com  
2001 Ross Avenue, Suite 900  
Dallas, Texas 75201-2911  
Tel. 214.953.6500

David R. Eastlake  
State Bar No. 24074165  
David.eastlake@bakerbotts.com  
910 Louisiana Street  
Houston, Texas 77002-4995  
Tel. 713.229.1234

-and-

**JORDAN, LYNCH & CANCIENNE  
PLLC**

Michael Cancienne  
State Bar No. 24055256  
Kevin Jordan  
State Bar No. 11014800  
Joseph W. ("Jeb") Golinkin II  
State Bar No. 24087596  
1980 Post Oak Blvd., Ste. 2300  
Houston, Texas 77056  
713.955.4028  
mcancienne@jlcfirm.com  
kjordan@jlcfirm.com  
jgolinkin@jlcfirm.com

*Co-Counsel for Alta Power  
LLC*

By: /s/ Andrew P. LeGrand

**GIBSON, DUNN & CRUTCHER LLP**

John T. Cox III (Tex. Bar No. 24003722)  
Andrew LeGrand (Tex. Bar No. 24070132)  
2001 Ross Avenue, Suite 2100  
Dallas, Texas 75201-2911  
Tel: 214.698.3100  
TCox@gibsondunn.com  
ALegrand@gibsondunn.com

Eric T. Haitz (Tex. Bar No. 24101851)  
811 Main Street, Suite 3000  
Houston, Texas 77002  
Tel: 346.718.6600  
EHaitz@gibsondunn.com

*Attorneys for General Electric International, Inc.*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

*/s/ Andrew LeGrand* \_\_\_\_\_

Andrew LeGrand

*Attorney for General Electric  
International, Inc.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for General Electric International, Inc. met and conferred with counsel for WattStock, LLC (“WattStock”) by phone and email on July 13, 2022 and July 15, 2022. Due to travel schedules, WattStock is unable to join this motion as of the time of filing. WattStock is not opposed to this motion but is not in a position to join at the time of filing.

/s/ Andrew LeGrand

Andrew LeGrand

*Attorney for General Electric  
International, Inc.*